

NOV 13 1989

For Six Month Period Ending \_\_\_\_\_

(Insert date)

Name of Registrant

Prather Seeger Doolittle & Farmer

Registration No.

1815

Business Address of Registrant 1600 M Street, N.W.

7th Floor

Washington, D.C. 20036

I—REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

N/A

Name

Position

INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

89 DEC 21 P4:26

RECEIVED  
DEPT. OF JUSTICE  
CRIMINAL DIVISION

Date Connection  
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☐ N/A

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
Jane Luxton	1503 Woodacre Drive McLean, VA 22101	Associate	July 1, 1989

## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

- 
9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

- 
10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

The Federal Government of Nigeria, The Royal Bank of Canada, Comite Textil de la Sociedad Nacional de Industrias, Salzgitter, A.G. and subsidiaries.

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

The Federal Republic of Nigeria: General legal representation on economic and other matters arising under domestic and international law, including assessing trends in U.S. policies, identifying support for economic development in Nigeria, encouraging private investment and expansion of the markets for Nigerian exports.

The Royal Bank of Canada: General legal representation relative to issues and concerns in the area of U.S.-Canadian banking relations generally and to principal's proposed application under §4(c)(9) of the Bank Holding Company Act to retain Canadian Government securities activities in the United States of Dominion Securities Corporation under the Canada-U.S. Free Trade Agreement.

Salzgitter, A.G. and subsidiaries: General legal representation, analysis and information gathering relative to issues and concerns in the area of U.S. export control legislation and regulations.

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<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☒ No ☐

See attached.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

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<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
<u>Salzgitter, A.G.:</u>			
7/6/89		fees & disbursements	\$49,040.65
8/25/89		"	83,925.04
10/23/89		"	62,244.08
<u>Comite Textil:</u>			
6/20/89		fees & disbursements	\$ 9,026.57
8/2/89		"	17,137.78
6/20/89		"	3,153.05
6/15/89		"	3,655.35
			(cont'd)
			<u>Total</u>

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).  
<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

## 15. (a) DISBURSEMENTS—MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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Nigeria:

Reporting period	postage	\$ 3.80
	duplicating	25.40
	messengers & couriers	108.25
	telephone & tele-	
	transmissions	61.11
	business meals	77.65
	intown travel & park-	
	ing	12.00
		<u>\$ 288.21</u>

Comite Textil:

Reporting period	postage	\$ 13.15
	duplicating	278.00
	telephone & teletransmissions	523.69
	messengers & courier systems	273.50
	professional fees	1204.13
	publications & printing	383.25
	business meals & meetings	45.00
		<u>\$2720.72</u>

Royal Bank of Canada:

Reporting period	postage	\$ 1.50
	duplicating	144.60
	telephone & teletransmissions	362.27
	messengers & courier systems	296.75
	publications & printing	666.09
	intown travel & parking	4.00
	professional & stenographic fees	894.75
		<u>\$2369.96</u>

(cont'd)

Total

## 15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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## (c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
5/16/89	\$100.00	Friends of Stan Parris	Stan Parris
5/16/89	50.00	Republican Party of Virginia	n/a
7/2/89	20.00	Democratic National Committee	n/a
8/1/89	1000.00	Bill Bradley for U.S. Senate	Bill Bradley
8/1/89	400.00	Committee for Tim Wirth, Inc.	Timothy Wirth

(cont'd)

## V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Salzgitter, A.G.

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

- ☐ Radio or TV broadcasts    ☐ Magazine or newspaper articles    ☐ Motion picture films    ☒ Letters or telegrams  
☐ Advertising campaigns    ☐ Press releases    ☐ Pamphlets or other publications    ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

- ☐ Public Officials    ☐ Newspapers    ☐ Libraries  
☒ Legislators    ☐ Editors    ☐ Educational institutions  
☐ Government agencies    ☐ Civic groups or associations    ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in this political propaganda:

- ☒ English    ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

## VI—EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following: n/a

Exhibit A<sup>6</sup>    Yes ☐    No ☐  
 Exhibit B<sup>7</sup>    Yes ☐    No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

## 27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

See attached.

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

*Thomas L. Farmer*

Thomas L. Farmer

Subscribed and sworn to before me at WASHINGTON, D.C.

this 21<sup>ST</sup> day of DECEMBER, 19 89

*Jeremiah R. Bannon*

(Signature of notary or other officer)

My Commission Expires January 14, 1993

<sup>8</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement?

Yes.

If yes, identify each such foreign principal and describe in full detail your activities and services:

(cont'd)

Comite Textil de la Sociedad Nacional de Industrias: General legal representation and advisory services relative to issues and concerns in the area of U.S.-Peruvian trade relations generally and other matters arising under domestic and international law, including assessing economic trends, identifying support for development and expansion of markets for Peruvian textiles and apparel, making comparative legal analyses with regard to U.S. policies regulating these Peruvian exports, and relative to bilateral negotiations and implementation of provisions of a Textile Agreement between the two countries.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Federal Republic of Nigeria

During this reporting period registrant has engaged in no activities on behalf of principal not exempt by §3(g) of the Foreign Agents Registration Act.

The Royal Bank of Canada

During this reporting period registrant has engaged in no activities on \_\_\_\_\_

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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Salzgitter, A.G.

On behalf of principal, registrant has rendered advice to principal relative to proposed amendments to the Export Administration Act of 1979 (S. 8), the Arms Export Control Act (S. 238) and other proposed legislation relative to chemical weapons issues including export provisions regulating delivery system materials and technology; registrant has corresponded, met and spoken with U.S. officials of Congress, the National Security Council, the Central Intelligence Agency and the U.S. Departments of Commerce, Defense, State and Treasury with regard to developing methods for identification of destination countries and means for verification and monitoring the regulation of raw materials, equipment and technical assistance, and with regard to general trade and commercial interests affecting principal, including the possible tightening of trade restrictions, protection of trade secrets, and extraterritorial applications in the development of multilateral efforts, not only to strengthen norms against violation of international law in the use of lethal chemical and biological agents, but also to discourage suspicious or 'renegade' trade practices and to encourage mutual cooperation in effectively implementing a regime to control the proliferation of such munitions stockpiles, their transfer, production and acquisition, as follows:

(cont'd)

<sup>2</sup>The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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U.S. Congress:

David P. Barton, Consultant, Committee on Foreign Affairs, U.S. House of Representatives, 2170 Rayburn House Office Building, Washington, D.C. 20515 (6/2, 6/16, 6/26, 6/27, 7/5, 7/14, 7/31, 8/15, 8/16, 9/11, 9/14, 10/18, 11/3, 11/7, 11/8, 11/9, 11/10/89)

Werner Brandt, Assistant to the Majority Leader, Thomas S. Foley, H-114 Capitol Building, Washington, DC 20515 (6/5, 7/6, 7/14/89)

Thomas S. Foley, Majority Leader, U.S. House of Representatives, H-114 Capitol Building, Washington, DC 20515 (5/31, 6/5, 7/26)

Martin J. Gruenberg, Staff Director, Subcommittee on International Finance and Monetary Policy, Committee on Banking, Housing and Urban Affairs, SD-534 Dirksen Senate Office Building, Washington, DC 20510 (9/8/89)

Nancy Landon Kassebaum, United States Senate, SR-302 Russell Senate Office Building, Washington, DC 20510-1602 (9/13, 9/18, 10/6/89)

Lori Esposito Murray, SR-302 Russell Senate Office Building, U.S. Senate, Washington, DC 20510-1602 (9/18, 9/19/89)

Claiborne Pell, U.S. Senate, SR-335 Russell Senate Office Building, Washington, DC 20510-3901 (10/4/89)

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<sup>2</sup>The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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Michael S. Perko, Senior Policy Analyst, Office of Senator Timothy E. Wirth, U.S. Senate, SR-380 Russell Senate Office Building, Washington, DC 20510-0603 (7/19, 7/21, 7/31, 8/3, 8/15, 8/18, 8/21, 9/8, 9/12, 10/2/89)

Jeff Seabright, Legislative Assistant, Office of Senator Timothy E. Wirth, United States Senate, SR-380 Russell Senate Office Building, Washington, DC 20510-0603 (10/31/89)

Frank A. Sieverts, Press Spokesman, Committee on Foreign Relations, U.S. Senate, SD-446 Dirksen Senate Office Building, Washington, DC 20510 (10/3, 10/5/89)

Ivo J. Spalatin, Staff Director, Subcommittee on Arms Control, International Security and Science, Committee on Foreign Affairs, U.S. House of Representatives, 2410A Rayburn House Office Building, Washington, DC 20515 (5/23, 6/5/89)

John G. Walsh, Economist/Minority Staff Aide, Subcommittee on International Finance and Monetary Policy, Committee on Banking, Housing and Urban Affairs, U.S. Senate, SD-534 Dirksen Senate Office Building, Washington, DC 20510 (6/16, 6/26, 7/20, 10/11, 10/18, 10/30, 11/8, 11/9/89)

Timothy E. Wirth, U.S. Senate, SR-380 Russell Senate Office Building, Washington, DC 20510-0603 (7/7, 7/10, 7/19, 8/1, 8/10, 8/15, 8/28, 9/8, 9/22, 10/23, 10/26, 10/31/89)

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<sup>2</sup>The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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U.S. Department of State:

Gary B. Crocker, Theatre Military Forces Division Chief, Office of Politico-Military Analysis, Deputy Assistant Secretary for Functional Analysis and Research, Bureau of Intelligence and Research, U.S. Department of State, Room 6510, 2201 C Street, N.W., Washington, DC 20520 (6/5, 6/8, 7/19/89)

Allen Locke, Technology Transfer Division Chief, Office of Economic Analysis, Deputy Assistant Secretary for Functional Analysis and Research, Bureau of Intelligence and Research, U.S. Department of State, Room 6510, 2201 C Street, N.W., Washington, DC 20520 (6/9/89)

Douglas P. Mulholland, Assistant Secretary for Intelligence and Research, U.S. Department of State, Room 6531, 2201 C Street, N.W., Washington, DC 20520 (6/5/89)

Thomas Niles, U.S. Ambassador to Canada, American Embassy, 100 Wellington Street, Ottawa, K1P5P1, Canada (6/7/89)

Craig Stier, Bureau of Intelligence and Research, U.S. Department of State, 2201 C Street, N.W., Washington, DC 20520 (7/14/89)

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<sup>2</sup>The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

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National Security Council:

Eric Melby, International Economic Affairs, National Security Council, Room 365 Old Executive Office Building, Seventeenth Street and Pennsylvania Avenue, N.W., Washington, DC 20506 (5/15/89)

U.S. Department of the Treasury:

John E. Robson, Deputy Secretary of the Treasury, Room 3326, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Washington, DC 20220 (5/16/89)

U.S. Department of Commerce:

Dan Haendel, Deputy General Counsel, U.S. Department of Commerce, Room 5870, Fourteenth Street and Constitution Avenue, N.W., Washington, DC 20230 (8/1, 8/2/89)

U.S. Department of Defense:

Ken Moss, Director of Governmental Affairs, DTSA/IGA, U.S. Department of Defense, Suite 210, 400 Army Navy Drive, Arlington, VA 22202-2803 (5/16, 5/17, 6/3, 6/10, 6/15, 7/10, 7/14, 7/17, 8/10, 9/19/89)

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<sup>2</sup>The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.



12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

(cont'd)

Central Intelligence Agency:

Marten van Heuven, National Intelligence Officer for Central Europe, Central Intelligence Agency, Washington, DC 20005 (7/20/89)

<sup>2</sup>The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

14. (a) RECEIPTS -- MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

Date	From Whom	Purpose	Amount
(cont'd)			
6/20/89	Comite Textil	fees & disbursements	\$ 2,864.22
8/21/89	"	"	1,115.24
9/18/89	"	"	1,472.86
<u>Nigeria:</u>			
7/21/89		fees & disbursements	\$ 4,522.75
<u>Royal Bank of Canada:</u>			
7/11/89		fees & disbursements	\$ 13,986.03
7/31/89		"	7,023.75
7/4/89		"	5,000.00
10/2/89		"	5,000.00
		Total =	\$ 269,167.37

<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

## 15(c). Disbursements -- Political Contributions

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes.

<u>Date</u>	<u>Amount or thing of value</u>	<u>Name of political organization</u>	<u>Name of candidate</u>
(cont'd)			
9/89	\$ 250.00	New Yorkers for Koch	Ed Koch
10/13/89	25.00	New Coalition	n/a
10/29/89	35.00	Democratic National Committee	n/a
11/89	25.00	Wilder for Governor	Doug Wilder
11/2/89	350.00	Jim McDermott for Congress	James McDermott

<sup>5</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS -- MONIES

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?

Yes.

- (2) transmitted monies to any such foreign principal?

No.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
<u>Salzgitter, A.G.:</u>			
Reporting period		professional fees & meeting	\$ 4,566.81
		postage	12.60
		duplicating	515.20
		telephone & teletransmissions	3,803.41
		messengers & courier systems	503.00
		travel	2,323.58
		intown travel & parking	136.50
		business meals	1,485.11
		publications & printing	60.80
		overtime secretarial support	130.23
			\$ 13,537.24
		Total =	\$ 18,916.13

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